ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification:	Covering calendar year 2017
Date filed:	02/22/2018
Name of company(s) covered by this certification:	First Step Internet, LLC
Form 499 Filer ID:	829017
Name of signatory:	Kevin Owen
Title of signatory:	President and Chief Executive Officer

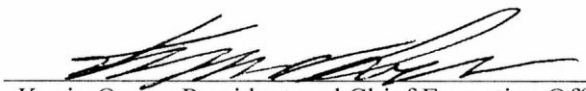
1. I, Kevin Owen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*

2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.

3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Kevin Owen, President and Chief Executive Officer

Attachments: Accompanying Statement explaining CPNI procedures

First Step Internet, LLC
Statement of CPNI Procedures and Compliance

First Step Internet, LLC ("FSI") does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. At this time, FSI does not engage in sales or marketing campaigns that would require customer approval for use of CPNI nor does FSI share any CPNI with third parties such as joint venture partners or independent contractors. Other than for the direct purpose of serving the customer, FSI's employees are required to maintain the confidentiality of all CPNI, including customer information that is obtained as a result of our employees' employment by FSI, and improper access and use/abuse of CPNI by staff is grounds for immediate termination.

FSI maintains a record of all sales and marketing campaigns that use CPNI.

If FSI elects in the future to use CPNI in a manner that does require customer approval, it will follow the applicable FCC rules as currently set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that proper notification is provided, proper customer approval is obtained and proper records are maintained before CPNI is used or disclosed.

FSI has put into place processes to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI, as set forth below.

FSI has instituted authentication procedures to safeguard the disclosure of call detail over the telephone and online. FSI's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Passwords are always established with the customer at the time the account is opened; postponing password choice or not having an initial password are not an option for the customer. If the customer chooses not to assign a password, a secure password will be generated at random and issued to the customer.

Passwords on FSI's system are not just used to authenticate the user to our personnel when interacting with customer service, but are also an integral part of FSI's service itself. Our computer systems require that the customer (or the customer's equipment) supply the correct password before service is rendered; thus, customers cannot make effective use of the service without knowing their password. This is true across the entire range of services FSI provides, including telephony. FSI does not disclose call detail over the telephone or online if the appropriate password is not provided.

FSI has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure operates as follows: If a

customer loses or forgets their password, FSI will allow them to create a new one after they have established to FSI's satisfaction that they are the owner of the account by either (a) answering if FSI calls them back at one of their phone numbers of record, or (b) the customer comes to FSI's offices in person and provides government-issued photo identification.

If the customer cannot provide a password and is not re-authenticated, FSI would only provide call detail by sending it to the customer's address of record or by calling the customer's telephone number of record.

FSI discloses CPNI at its retail location only if the customer presents a valid photo ID matching his/her account information.

FSI has procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. Specifically, the customer is sent an e-mail to their e-mail address of record notifying the customer, without specifically listing the changed information, that a change has been made to their account, and that if the change was not performed or authorized by them, they should contact FSI immediately.

FSI has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance. FSI has established procedures for maintaining records of such breaches for a minimum of two years.

FSI may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of FSI, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and

(5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

FSI has not had any breaches, but does have a process in place to maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

FSI has not taken any actions against data brokers in the last year.

FSI did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.

FSI has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.